

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
JEFFREY S. VAUGHN, individually and on :
behalf of those Class Members similarly situated, :

Plaintiff, :

-against- :

LEEDS, MORELLI & BROWN, P.C., LEEDS, :
MORELLI & BROWN, L.L.P., LEEDS & :
MORELLI, LEEDS, MORELLI & BROWN, :
PRUDENTIAL SECURITIES, INC., :
PRUDENTIAL FINANCIAL, INC., WACHOVIA :
CORPORATION, WACHOVIA SECURITIES, :
LLC, LENARD LEEDS, STEVEN A. MORELLI, :
JEFFREY K. BROWN, JAMES VAGNINI, :
FREDERIC DAVID OSTROVE, ROBERT JOHN :
VALLI, JR., DISCRIMINATION ON WALL :
STREET, INC. DISCRIMINATION ON WALL :
STREET, MANHATTAN, INC., JOHN DOES, 1- :
10 AND JANE DOES, 1-10 a fictitious :
designation for presently unknown licensed :
attorneys, professionals and/or unknown persons :
or entities,, :

Defendants. :

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Case No. 04 Civ. 8391 (DLC)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, pursuant to the Federal Arbitration Act, 9 U.S.C. § 10, and Rule 6.1 of the Local Civil rules of the United States District Court for the Southern District of New York, and upon the accompanying Memorandum of Law and Affirmation of Blaine H. Bortnick dated August 2, 2007, the undersigned hereby seeks an order from this Court, Hon. Denise L. Cote, U.S.D.J., at the United States Courthouse, 500 Pearl Street, New York, New York 10007, as soon as counsel may be heard, directing that the stay in this matter be lifted, and pursuant to the Federal

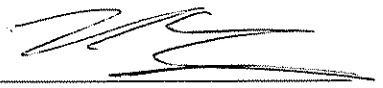
Arbitration Act, 9 U.S.C. § 10, and directing the vacatur of an arbitration award received by Plaintiff on May 11, 2007, concerning the arbitration between Plaintiff and Defendants, Leeds, Morelli & Brown, P.C., Prudential Securities, Inc., et al.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Local Civil Rule 6.1, opposing affidavits and answering memoranda shall be served within ten business days after service of the moving papers.

Dated: New York, New York
August 2, 2007

Respectfully submitted,

LIDDLE & ROBINSON, L.L.P.

By: 
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Attorneys for Plaintiff

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